

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

Re: D.I. 140

**NOTEHOLDERS' OBJECTION TO DEBTOR'S MOTION FOR ENTRY OF AN  
ORDER SHORTENING THE NOTICE PERIOD WITH RESPECT TO THE DEBTOR'S  
EMERGENCY MOTION FOR A DETERMINATION THAT THE AUTOMATIC STAY  
DOES NOT APPLY TO THE DISGORGEMENT MOTION FILED BY THE DEBTOR  
IN THE NEVADA STATE COURT**

Noteholders<sup>1</sup> hereby file this Objection to Debtor's Motion for Entry of an Order Shortening the Notice Period with Respect to the Debtor's Emergency Motion for a Determination that the Automatic Stay Does Not Apply to the Disgorgement Motion Filed by the Debtor in the Nevada State Court [D.I. 140] (the "Motion") and state as follows in support thereof:

1. As this Court surmised at the recent status conference, there are a number of issues to be addressed following the dismissal of the receivership in Nevada, all of which need to be teed

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<sup>1</sup> "Noteholders" are Brett Hatton, an individual; Earl Coronel, an individual; Autumn Wind Global Multi-Strategies Fund, LP, a Delaware Limited Partnership; Damon Gersh, an individual; Jason Eckenroth, an individual; Sherri R. Sands, as trustee of the Sherri R. Sands Revocable Trust, a Florida Trust; Glickfield Capital Management, LLC fbo M. Glickfield Dynasty Trust, a Maryland Trust; Glickfield Capital Management, LLC fbo Cheryl Newmark, a Maryland Trust; Glickfield Capital Management, LLC fbo Marla Schram, a Maryland Trust; Carrickfergus Investments Limited, a British Virgin Islands Company; Stephane Carnot, as Trustee of the Carnot Family Trust, a District of Columbia Trust; Dorsey and Whitney Trust Co., LLC, as Trustee of the Dylan Taylor 2011 Grantor Trust, a South Dakota Trust; Esecos, LLC, a Michigan Limited Liability Company; Sequis Group, LLC, a Michigan Limited Liability Company; Matthew Briggs, as Trustee of the Briggs Management Trust; Michael Rubenstein, an individual; June Farmer, an individual; Thomas Carl Myers, an individual; Richard L. Rogers, an individual; Neal J. Glickfield, as Trustee of the Neal J. Glickfield 2018 Trust, a Maryland Trust; Lineage, LLC, a Virginia Limited Liability Company; Charles B. Chokel, as Trustee of the Charles B. Chokel Trust u/a 4/21/92, a New Hampshire Trust; Brian Gray, an individual; HFJ Investments I, LLC, a Texas Limited Liability Company; Patricia B. Jones, as Trustee of the Patricia B. Jones Revocable Trust, a Maryland Trust; John B. Shaw as Trustee of the John B. Shaw 2012 Family Grantor Trust; and 1086 LLC, a Maryland Limited Liability Company.

up before the Court in the proper fashion. Debtor's request for relief from the automatic stay to permit the Nevada court to decide its disgorgement motion on an expedited basis is an unwarranted attempt to circumvent analysis of all of those issues as a whole and is unnecessary.

2. Pursuant to this Court's guidance, the Noteholders informed Judge Denton of the status conference through the filing attached hereto as Exhibit 1. As this Court repeatedly recognized at the status conference, Judge Denton will make his own decision on whether he can decide the issues before him in Nevada. *See* August 26, 2022 Transcript attached as Exhibit A to the filing at Exhibit 1 hereto ("Transcript") at 35:11-18, 41:14-20, 46:4-10; 56:6-10. And if this Court ultimately determines his decision to be void, it will deal with the void judgment here. Transcript 46:4-10.

3. Accordingly, Debtor fails to show any need for shortened notice or an expedited hearing and the Noteholders object to such requests.

WHEREFORE, Noteholders request that this Court deny the Motion and grant them such other relief the Court deems just and appropriate.

Dated: August 30, 2022  
Wilmington, Delaware

**BLANK ROME LLP**

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